

TITLE 326 AIR POLLUTION CONTROL BOARD
#01-407(APCB)

SUMMARY/RESPONSE TO COMMENTS FROM THE SECOND COMMENT PERIOD

The Indiana Department of Environmental Management (IDEM) requested public comment from July 1, 2002, through July 31, 2002, on IDEM's draft rule language. IDEM received comments from the following parties:

U.S. Steel-Gary Works (USS)

Following is a summary of the comments received and IDEM's responses thereto.

Comment: U.S. Steel did not receive IDEM's daily background concentration estimates until July 20 and so could not complete air dispersion modeling, evaluate the impacts on plant operations, and finalize the limitations revision request before the end of this comment period. U.S. Steel notes that the daily background concentration estimates provided by IDEM are elevated and range up to twenty percent of the national ambient air quality standards. U.S. Steel would like to understand IDEM's methodology and assumptions in developing estimated background concentrations that result in such significant concentrations prior to U.S. Steel completing further air dispersion modeling. Therefore, U.S. Steel cannot provide complete comments on specific limitations incorporated in the Second Notice. U.S. Steel would like to meet with IDEM staff to discuss further air dispersion modeling, including estimated background concentrations, and establishing PM10 limitations that are acceptable to both IDEM and U.S. Steel. (USS)

Response: IDEM and U. S. Steel discussed the modeling issues and U. S. Steel completed and submitted air dispersion modeling to IDEM. The results of these efforts are reflected in the draft rule presented to the board for preliminary adoption.

Comment: In 326 IAC 6-1-10.1(d)(36), the following limits should be modified to reflect the PM10 emission limitations currently in effect as the result of Agreed Orders with IDEM.

Source	Emission Limit (units)	Emission Limit (lbs/hr)
Coke battery #2 precarbonization system electrostatic precipitators	Not applicable	62.5 (total)
Coke battery #3 precarbonization system electrostatic precipitators	Not applicable	62.5 (total)

(USS)

Response: IDEM concurs based on the results of the modeling effort and has made the suggested change.

Comment: In 326 IAC 6-1-10.1(d)(36), the following limits should be modified to reflect a limitation that allows the greater use of byproduct fuels than is represented by the limitation in the Second Notice. The requested limit is a decrease from the limit in the current rule.

Source	Emission Limit (units)	Emission Limit (lbs/hr)
84" Hot Strip Mill (HSM) reheat furnace Nos. 1, 2, 3, and 4 (USS)	0.012 lb/MMBTU	27.85 (total)

Response: The emission limits of 0.017 lbs/MMBtu and 40.80 (total) lbs/hr were used in response to modeling data submitted by U. S. Steel after this comment was received. Though these limits are higher than the current rule, the modeling shows no impact on air quality due to reductions in other units.

Comment: In 326 IAC 6-1-10.1(d)(36), the following limits should be modified to reflect limitations that are currently part of a variance from the current Rule granted to U.S. Steel.

Source	Emission Limit (units)	Emission Limit (lbs/hr)
Coke battery number 5 underfiring stack	Not applicable	24.70
Coke battery number 7 underfiring stack	Not applicable	21.30
Coke plant boiler house, boiler number 8 (USS)	0.012 lb/MMBTU	2.89

Response: IDEM concurs and has made these changes.

Comment: In 326 IAC 6-1-10.1(d)(36), limitations for coke battery number 2/3 quench tower numbers 1, 2/3, and 5/6 were not included in the current rule or variance from the rule because the physical construction of these towers precludes stack testing using standard approved testing methods. Consequently, compliance with numerical limitations cannot be demonstrated so numerical limitations for the quench towers should not be included in the revised rule. (USS)

Response: IDEM concurs and has removed these units from the draft rule.

Comment: In 326 IAC 6-1-10.1(d)(36), the following unit should be added to reflect a recently issued Part 70 permit modification allowing the construction and operation of the unit.

Source	Emission Limit (units)	Emission Limit (lbs/hr)
Coke plant boiler house lime storage silo baghouse stack (USS)	0.030 gr/dscf	0.28

Response: IDEM concurs based on the results of the modeling effort and has added this unit and emission limits.

Comment: In 326 IAC 6-1-10.1(d)(36), limitations for the following groupings of units should

have the notation “(total)” in the lbs/hr column:

Coke battery #2 precarbonization system electrostatic precipitators
Coke battery #3 precarbonization system electrostatic precipitators
Number 3 sinter plant coolers
Number 3 sinter plant discharge area baghouses
Number 3 sinter plant windbox stacks
Number 4 boiler house boilers
Plate mill batch reheat furnaces nos. 6 and 8
Plate mill continuous reheat furnaces 1 and 2
84" HSM reheat furnaces nos. 1, 2, 3, and 4
Coke plant boiler house, boiler numbers 1 and 2
Number 1 BOP gas cleaning system
Number 2 Q-BOP gas cleaning system
TBBH boiler numbers 1, 2, 3, and 5
EGL boiler house

(USS)

Response: IDEM concurs and has made the suggested changes.

Comment: The text of 326 IAC 6-1-10.1(f)(5)(C) should be changed as follows to reflect the limit for the sinter plant windbox stacks as the result of the Agreed Orders with IDEM:

(C) The first four (4) impingers shall be used to determine the quantity of condensible particulate emissions. Compliance shall be achieved if the sum of the front half and the back half is less than or equal to the mass emission limit of ~~one hundred sixty-seven and one-tenth (167.1)~~ **one hundred (100) lbs/hr per stack**, and the front half catch is less than or equal to the mass concentration limit of ~~sixty-five thousandths (0.065)~~ **twenty thousandths (0.020)** gr/dscf in subsection (d).

(USS)

Response: IDEM concurs and has made the suggested change.

Comment: U.S. Steel has been granted a variance from 326 IAC 6-1-10.1(g)(3) by performing stack testing. The variance should be made permanent by eliminating this provision from the rule. (USS)

Response: Alternative monitoring requirements on the precarbonization system were conveyed to U. S. Steel in a letter dated May 16, 1997. However, the waiver from installing and operating COMs as required in 326 IAC 6-1-10.1(g)(3) can be withdrawn if a method of monitoring technology or operation changes make the operation of COMs feasible. Therefore, IDEM believes the language in this provision should remain in the rule.

IDEM encourages further discussion on this issue and will consider revisions to the language to reflect the conditions in the waiver under which U. S. Steel is currently operating.

Comment: The limits for certain units in 326 IAC 6-1-10.1(h)(20) include restrictions that

they combust natural gas only. Because all combustion units are already listed in 326 IAC 6-1-10.1(d)(36) with appropriate limitations, this provision should be deleted. (USS)

Response: IDEM concurs and has made the suggested change.

Comment: Provisions in 326 IAC 6-1-10.1(k)(8)(A) through (D), (I), and (J) contain compliance deadlines that have passed. U.S. Steel has complied with the requirements, so these provisions are no longer needed and should be deleted. (USS)

Response: IDEM concurs and has made the suggested change.

Comment: Air dispersion modeling for the current rule was based on the restrictions in 326 IAC 6-1-10.1(k)(8)(E), (F), and (G). The air dispersion modeling used for the new limitations proposed in the Second Notice are not based on the restrictions in these three provisions, therefore, these three provisions should be deleted. (USS)

Response: IDEM concurs and has made the suggested change.

Comment: The requirement in 326 IAC 6-1-10.1(k)(8)(H) for a 90-day notice before switching fuels from gas to coal at Coke Plant Boiler House Boiler Numbers 4, 5, and 6 is not needed. U.S. Steel has no plans to convert these boilers from gas to coal in the foreseeable future, and such fuel switching would require permit modification approval by IDEM prior to making such a modification. Therefore, the notification requirement in this provision is redundant and unnecessary and should be deleted. (USS)

Response: IDEM concurs and has made the suggested change.